

**IN IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**JASON DALE COLE &  
CRYSTAL FAYE CHESSER,**

*Defendant.*

**Case No. CR-24-80 RAW**

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**UNITED STATES' SUPPLEMENTAL NOTICE OF INTENT  
TO OFFER EXPERT TESTIMONY**

COMES NOW the plaintiff, the United States of America, by and through Christopher J. Wilson, United States Attorney, and Assistant United States Attorney Michael E. Robinson, and respectfully submits this supplemental notice of intent to introduce expert testimony, under Rules 701, 702, and 703 of the Federal Rules of Evidence. *See also* Rule 16(a)(1)(G), Federal Rules of Criminal Procedure. In compliance with Rule 16, the United States submits:

1. The United States will call DEA Special Agent (SA) Ryan Young at trial. In addition to the testimony articulated in the United States' Notice of Intent to Offer Expert Witness (Doc. No. 55), SA Young will testify regarding which amounts of methamphetamine are generally associated with personal use, and what constitutes a typical user's single use of methamphetamine.
2. Specifically, SA Young will testify that the typical single use (one dose) of methamphetamine is one tenth (.1) of a gram, that the average personal use amount is approximately three and a half (3.5) grams<sup>1</sup>, and that drug traffickers typically possess drug paraphernalia items, such as scales, pipes, and baggies as part of their drug trafficking activities.

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<sup>1</sup> This amount is commonly referred to as an "eight ball," which SA Young will state is so named because it is roughly one eighth of an ounce.

3. SA Young will also testify regarding the approximate street value of the methamphetamine in Defendant's possession, and all other topics identified in Doc. No. 55. Specifically, based on his training and experience, SA Young will testify that the price of methamphetamine ranges from \$40-\$50 per gram in Eastern Oklahoma, but when purchasing in bulk, an ounce (28 grams) of methamphetamine can be purchased for \$400.

4. SA Young will also testify about basic facts about methamphetamine, including common ways methamphetamine is ingested, as well as how, in his experience, it is common for drug traffickers to possess firearms to protect and further their drug trafficking enterprise. Additionally, SA Young will testify about how drug traffickers typically store methamphetamine that is intended for distribution.

In compliance with the Federal Rules of Criminal Procedure, Rule 16(a)(1)(G)(v), I, SA Ryan Young, have reviewed and approve of the government's disclosures above.

Ryan Young, SA DEAMay 2, 2025

Date

**CERTIFICATE OF SERVICE**

I certify that on May 2, 2025, I electronically transmitted the foregoing to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Rhyder Jolliff  
Barbara Waltz,  
Dan Medlock

Attorneys for Defendant Cole  
Attorney for Defendant Chesser

s/

Michael E. Robinson

MICHAEL E. ROBINSON

Assistant United States Attorney